

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

IN RE:

ARMADA OIL, INC.

Debtor

Case No. 15-41561

Chapter 7

**TRUSTEE'S MOTION TO EXTEND TIME TO  
ASSUME OR REJECT EXECUTORY CONTRACTS**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

Linda S. Payne, the duly appointed Chapter 7 Trustee, ("Trustee") for the bankruptcy estate of Armada Oil, Inc., files this Motion to Extend Time to Assume or Reject Executory Contracts seeking to extend the time by which she is required to assume or reject executory contracts pursuant to 11 U.S.C. § 365(d)(1). In support, the Trustee would respectfully show the Court as follows:

1. This Court has jurisdiction to hear this adversary proceeding pursuant to 28 U.S.C. §§ 157 and 1334, and the Order of Reference for the United States District Court for the Eastern District of Texas.
2. This motion is brought pursuant to 11 U.S.C. §§ 105(a) and 365(d)(1). Accordingly, this matter involves a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O).
3. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
4. On August 28, 2015, Armada Oil, Inc. (the "Debtor") filed a voluntary petition

under Chapter 7 of the United States Code (the “Bankruptcy Code”) commencing the above-referenced bankruptcy case.

5. The § 341 First Meeting of Creditors was held on October 5, 2015.

6. Debtor operated an uncompleted wellbore - Bear Creek # 1 Well. Trustee is contemplating selling the Debtor’s assets.

7. Trustee may desire to assume and assign the Andarko Farmout Agreement with Andarko E&P Onshore, LLC and perhaps other related executory contracts.

8. The deadline to assume and assign executory contracts under 11 U.S.C. § 365(d)(1) is currently October 27, 2015.

9. Trustee requests a sixty (60) day extension of this deadline to December 26, 2015 to allow her time to evaluate, and if appropriate, negotiate an assignment of executory contracts and file a motion to assume or reject.

WHEREFORE PREMISES CONSIDERED, Trustee prays that the Court enter an order granting the relief requested above and granting the Trustee such other and further relief to which he is justly entitled.

Dated: October 27, 2015

Respectfully Submitted,

/s/ Bill F. Payne

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing instrument was served on the parties listed on the attached mailing matrix either through the Court's electronic notification system as permitted by Appendix 5005 III. E. to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid on October 27, 2015.

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